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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, MARIELA  
GONZÁLEZ, FREDDY JOSE ARAPE RIVAS,  
M.H., CECILIA DANIELA GONZÁLEZ  
HERRERA, ALBA CECILIA PURICA  
HERNÁNDEZ, E.R., HENDRINA VIVAS  
CASTILLO, A.C.A., SHERIKA BLANC, VILES  
DORSAINVIL, and G.S.,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as  
Secretary of Homeland Security, UNITED  
STATES DEPARTMENT OF HOMELAND  
SECURITY, and UNITED STATES OF  
AMERICA,

Defendants.

Case No. 3:25-cv-01766-EMC

**DECLARATION OF EMILOU MACLEAN  
IN SUPPORT OF MOTION FOR  
COMPLIANCE WITH COURT ORDER  
[ECF 279]**

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1 I, Emilou MacLean, declare:

2 1. I am an attorney at law duly licensed and entitled to practice in the State of  
3 California. I am a Senior Staff Attorney at ACLU Foundation of Northern California, counsel of  
4 record in this action for Plaintiffs. I make this declaration in support of Plaintiffs' Motion for  
5 Compliance with Court Order [ECF 279] ("Motion for Compliance"). I have personal knowledge of  
6 the following facts and, if called as a witness, I could and would testify competently as follows.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of the USCIS webpage  
8 regarding Venezuela's TPS designation as it appeared on Tuesday, September 9, 2025 at 19:56  
9 GMT.

10 3. On Monday, September 8, 2025, I emailed Defendants' counsel to confirm that  
11 Defendants would update the USCIS webpage concerning Venezuela's TPS designation in light of  
12 this Court's September 5, 2025 order (ECF 279). Defendants' counsel responded that: "The website  
13 will not be updated today. Defendants are assessing their obligations under Judge Chen's ruling,  
14 which did not include any injunctive order to immediately update the website. Defendants also note  
15 they have moved for a stay of judgment pending appeal, which has yet to be ruled upon by the  
16 Court." On September 9, 2025, I responded and informed Defendants that Plaintiffs would move for  
17 Defendants' compliance with this Court's September 5, 2025 order and requested Defendants'  
18 position on Plaintiffs' forthcoming motion. Defendants' counsel responded: "Defendants dispute the  
19 allegations of noncompliance and will oppose both the motion for compliance as well as any  
20 associated motion to shorten time." A true and correct copy of this email exchange is attached as  
21 **Exhibit B**.

22 4. Attached hereto as **Exhibit C** is a true and correct copy of the USCIS webpage  
23 regarding Haiti's TPS designation as it appeared on Tuesday, September 9, 2025 at 21:17 GMT.

24 I declare under penalty of perjury that the foregoing is true and correct, and that this  
25 declaration was executed in San Francisco, California this 9th of September, 2025.

26 /s/ Emilou MacLean

27 Emilou Maclean